

Officer Report

Application No.	25/1532/FH
Site Address	SOUTH KENT CHRISTIAN COMMUNITY CHURCH, 32 CHERITON ROAD, FOLKESTONE, CT20 1BZ
Officer Name	Robert Allan
Proposal	Conversion of church to 1no. two-bedroom dwelling.

Recommendation

Report Number	RD-438585
Recommended Decision	Recommended to be Approve with Conditions
Recommendation Date	16 October 2025

Report

Site

The application site is a small chapel / church style building located fronting Cheriton Road within the settlement boundary of Folkestone.

The building is set at an angle to the roadway within the roughly triangular plot. There are single storey elements to the eastern side of the main hall, offering a 'small hall' and kitchen area. The main hall area is double height, with no first floor. The structure appears to have been constructed in 1900 and is buff brick with red brick detail in the form of banding and arches, with decorative stonework, keystones and other architectural detailing. The roof is slate. It has a low boundary wall, with pillars and iron railings.

The application site is surrounded by residential properties. The rear gardens to properties on Victoria Grove are to the back of the building. Properties are between three and four storeys in height.

Relevant Site History

Y18/1401/FH - Change of use from church (class D1) to 3no. self-contained flats (class C3) - Refused.

Reasons for refusal:

- 1) The proposed development would result in the loss of an existing social and community facility, and it has not been satisfactorily demonstrated in the application that there is no longer a need for the facility or alternative community use, or that such a use is not viable.

- 2) The proposed residential flats would fail to meet the minimum National Space Standards for internal accommodation for residential properties, resulting in a substandard form of development that would not meet the minimum accommodation needs of the existing and future inhabitants and

would result in a cramped form of living and sleeping accommodation to the detriment of future inhabitants.

3) The proposal fails to provide information regarding parking provision for the residential units. It also fails to provide secure, safe and covered cycle parking space within the site for occupiers of the properties.

21/1770/FH - Change of use of existing church hall to two self-contained dwellings - Refused.

Reasons for refusal:

1) The proposed development would amount to an over intensive use of the site., resulting in the bedrooms of the proposed dwellings being served only by obscure glazed windows or roof lights, giving rise to an unacceptable degree of outlook, and in amenity space abutting the public highway which would, by virtue of its location, size and layout, fail to provide private, useable space of a size commensurate with that of the dwellings proposed. The proposed development would therefore give rise to sub-standard accommodation, significantly harmful to the residential amenity of future occupiers, contrary to policy HB1 and HB3 of the Places and Policies Local Plan and paragraph 130 of the National Planning Policy Framework.

2) The proposed cycle storage and bin storage in the front garden areas, in conjunction with the fencing inside the existing boundary treatment, would give rise to a cluttered and obtrusive appearance, with consequent harm to the character and appearance of the street scene contrary to Places and Policies Local Plan policies HB1 and HB8.

25/0105/FH - Change of use of church and church hall into a two-bedroom house on two levels and a one-bedroom house on one level. Refused.

Reasons for refusal:

1) The development would fail to provide sufficient privacy and outlook for future occupants of Unit 1 due to the positioning of habitable room windows along the western elevation at ground floor and bedrooms at mezzanine (first floor) level being served only by roof lights that would all be overlooked by residents at 34 Cheriton Road to the west of the site. The development would therefore result in an unacceptable standard of living for future occupants, contrary to Policies HB1 and HB3 of the Places and Policies Local Plan 2020.

2) The proposed development would fail to provide private, usable and adequately sized garden areas for both units and would fail to comply with the minimum external space standards. The development would therefore be detrimental to the residential amenity of the future occupants of the new dwellings. The proposal would as a result be contrary to policy HB3 of the Places and Policies Local Plan.

3) The proposed cycle storage and bin storage to the front of the property, in conjunction with the proposed boundary treatments and fencing, would give rise to a cluttered and obtrusive appearance, with consequent harm to the character and appearance of the street scene contrary to Places and Policies Local Plan policies HB1 and HB8.

25/0506/FH - Conversion of church and church hall to a two-bedroom house and attached one bedroom house. Refused.

Reason for refusal:

1) The proposed development would fail to provide private, usable or adequately sized external amenity space for both units and would therefore fail to comply with the minimum external space standards and be detrimental to the residential amenity of the future occupants of the new dwellings contrary to policy HB3 of the Places and Policies Local Plan and paragraph 135 of the National Planning Policy Framework.

Proposal

This application forms a resubmission of previously refused planning applications as listed above within the Planning History section.

Planning permission is sought for the conversion of the existing building to provide a single dwellinghouse. This would have a 128.4sqm ground floor, with a kitchen / dining room, two double bedrooms, one with ensuite, and a bathroom. A mezzanine floor of 13.9sqm is shown, which would have a gym area. The total Gross Internal Area would be 142.3sqm. A new gable end window is proposed to the first-floor level to serve the mezzanine, with obscure glazing to 2.0m in height, measured from internal finished floor level.

The dwellinghouse would be a two-bedroom, four-person unit, with a mezzanine floor with a gross internal area (GIA) of 142.3 sqm. The requirements of PPLP policy HB3 are 79 sqm GIA for a two-bedroom, four-person two-storey dwelling. There is 2.1 sqm of built-in storage – policy requirement is 2 sqm.

Cycle and bin storage would be accessed externally within a lean-to structure that would be retained for this purpose.

To the ground floor on the northwestern elevation, an existing door would be converted to a window. To the southwestern and southeastern elevations, windows would be converted to doors and vice-versa to allow access and means of escape, as denoted on the plans, to facilitate the proposed development. The existing dwarf brick wall, piers and metal railings will be retained, and soft landscaping is proposed also.

No parking has been proposed under the development.

Consultation Responses

Folkestone Town Council – No objection.

KCC Highways – Outside of consultation protocol

Southern water – No objection subject to conditions (reference to comment on 25/0506/FH)

Representations

One representation received to the proposed development, supporting the proposal. These comments have been summarised below:

- outdoor amenity space constrained by site layout
- an exception to Policy HB3 is appropriate in light of the proximity to Radnor Park and a forthcoming park area in Bouverie Square

Relevant Policies

NPPF Paragraphs: 11, 39, 48, 98, 124, 125, 135

Places and Policies Local Plan (2020): HB1, HB3, HB8, C2, T2, T5

Core Strategy Review (2022): SS1, SS3

Appraisal

Principle

The principle of the loss of the community asset for the conversion into residential use has already been considered through the assessment of the previous schemes (25/0506/FH, 25/0105/FH & 21/1770/FH) and there no new material or policy grounds to consider the scheme differently here.

The NPPF seeks to protect community places of worship; Core Strategy Local Plan policy SS3 requires development to address social and economic needs in the neighbourhood and not result in the loss of community, voluntary or social facilities (unless it has been demonstrated that there is no longer a need or alternative social/community facilities are made available in a suitable location); and PPLP policy C2 requires development leading to the loss of an existing community facility to demonstrate that:

1. There is no longer a demand for the facility within the locality, supported by evidence that the premises have been actively marketed for a minimum period of 12 months in the recent past prior to submission of the planning application; and
2. As part of the evidence in point 1 above, the sale or rental price was realistic for the existing use, supported with a written valuation from a commercial estate agent.

The property was previously used by a church that has now relocated to an alternative premises. It has previously been stated and accepted that all previous uses at the site are now accommodated at the new premises.

Under the current proposal, and both 25/0506/FH and 25/0105/FH, no marketing information has been provided. However, under 21/1770/FH, where marketing evidence had been provided, it was considered to meet the 12 months set out in the policy, where although some interest was recorded, much of it was for residential purposes. The loss of a community facility did not form a ground for refusal within 25/0506/FH, 25/0105/FH or 21/1770/FH and in the interests of consistent decision-making, it is considered that the proposal would meet the requirements set out under the policy and the loss of a community facility in this instance is acceptable in accordance with the PPLP, policy C2 and core strategy policy SS3.

The applicant has asserted that the site is brownfield land / previously developed land, as defined in the NPPF. This assessment is accepted by the Council, as well as acknowledging the substantial weight afforded to the development of such sites within settlements for homes unless substantial harm would be caused (NPPF para. 125) and noting the push to promote an effective use of land in meeting need for homes (para. 124).

Amenity

Future occupants

Policy HB3 of the PPLP states that planning permission will be granted for new build residential development where the proposed scheme:

1. Meets the nationally described technical housing space standard, or subsequent updates to the standard, including minimum floor-to-ceiling heights.

2. Provides an area of open space for each new dwelling, in the case of this proposal, a private garden of at least 10m in depth and the width of the dwelling would be required.

For a two-bedroom, four-person unit set across two floors 79 sq. metres of accommodation should be provided including room for storage. The total floorspace is stated to be 142.3 sqm, which would meet the nationally described space standards under policy HB3 in terms of overall footprint.

Windows are also proposed at ground floor along the northwestern elevation, which would serve habitable rooms (lounge/kitchen/diner). Previous schemes showed these with obscure glazing, to protect privacy. This would still be considered a reasonable requirement to secure via condition, to maintain levels of privacy for future occupiers. Even with the obscure glazing, with windows facing to the southwest and the high-level window in the gable, it is considered that there would be adequate diffuse and direct light to the living area to safeguard the amenities of future occupiers.

For new dwellings, policy HB3 requires a private garden with a depth of 10 metres across the width of the dwelling to be provided. For the previous two proposals this lack of adequate external amenity space formed a ground for refusal, notably the only ground on 25/0506/FH, and the current proposal similarly fails to provide an amenity space for the proposed dwelling that would meet the specific criteria of the policy.

While the proposed outdoor space is located to the front of the property and therefore not entirely private due to its visibility from the street, it would serve a single residential unit—where previously it was shared by two or more units. This change allows for a more appropriately sized and functional garden area, aligning with the external space standards set out in Policy HB3, and offering greater usability for future occupants. Additionally, this area would provide a defensible space for the property, helping to maintain a suitable separation between the dwelling and the public footway, which would be beneficial for residential amenity.

There are several public open spaces within the wider area, as well as the emerging park at the bus station site, which is being created as part of the 'Brighter Future' project underway within the town. These spaces are some distance away, require roads to be crossed and would not be a direct replacement to serve the day-to-day needs of family sized accommodation, as is proposed.

On balance, the development is considered to provide an acceptable standard of living for future occupants. While private amenity space has not been fully achieved, the revisions made in comparison to previous submissions are sufficient to address earlier concerns. The proposed layout offers a more functional and appropriate arrangement of outdoor space, enhancing usability and residential amenity.

Existing occupiers

The building is an existing structure and with no additions proposed to the structure, there would be no additional impact from overbearing presence, overshadowing or any change in outlook for neighbouring uses.

The windows in the northwestern elevation at ground floor would not, with obscure glazing, cause any overlooking for neighbouring properties. The proposed gable window may increase the perception of overlooking for neighbouring occupiers, but it is noted that there is a tight layout in the area, with the terraced properties overlooking adjacent garden areas already. Further, the submitted sections demonstrate that there would be limited overlooking opportunities and shows

proposed obscure glazing to 2.0m above internal finished floor level of the mezzanine, which can be secured via condition, to eliminate any possibility of a loss of privacy.

Overall, the proposal is not considered to be detrimental to the amenity of future occupiers in accordance with policies HB1 and HB3 of the PPLP.

Design, Visual Appearance

The proposed external alterations required to enable the conversion are considered minimal and would not be detrimental to the character or appearance of the building or the street scene.

The applicant has identified that the 'Brighter Future' project is underway, which as part of the Place Plan, identified six key priorities, with one being an improved gateway to the town centre and Bouverie Square, with Cheriton Road identified as a key connection into the town centre. Cheriton Road is also identified as a site that forms part of the 'celebrate what's great' element of the plan, with public realm upgrades along one of the main throughfares from Central Station to the Town Centre. This ongoing project is a material consideration.

This proposal would bring a currently redundant property back into productive use under single ownership. With the application of appropriate planning conditions, the development has the potential to deliver a high-quality scheme that would prevent further deterioration of the premises. The marketing exercise that has previously been undertaken has demonstrated that the property has limited alternative uses, and its reuse in this manner would contribute positively to the wider regeneration objectives of the District.

Turning to the proposed cycle and bin store, this would address a previous ground for refusal relating to a cluttered and obtrusive presence, so would be acceptable regarding the character and appearance of the street scene in accordance with PPLP policies HB1 and HB8 of the PPLP.

It would be reasonable, in order to safeguard the appearance of the street scene, to remove permitted development rights for outbuildings and fences etc.

Overall, the proposed use of the building is likely to safeguard the long term appearance of the property and the wider street scene, in an area that has been marked as one where public realm upgrades are important to wider regeneration aims.

Highway safety, parking

The proposed development provides no off-street vehicle parking. An edge of centre location such as this requires a maximum of 1 space per unit. It is noted that the proposed units would be in proximity to the town centre and that there are resident parking schemes in place on surrounding roads. Consequently, it is considered reasonable to have a 'zero parking' proposal at this site and it is considered in accordance with policy T2.

Adopted policy T5 requires one secure covered cycle space per bedroom and the submitted plans show that there would be at least one space for the dwelling. PPLP Policy HB3 requires bicycle storage to be provided in accordance with the standards set out in PPLP Policy T5 which also sets out that storage should be provided either within the curtilage of a dwelling or in a secure communal facility.

The requirements of both policy T2 and T5 are considered to have been met.

Biodiversity Net Gain

In relation to Biodiversity Net Gain, the proposed site would fall within the de minimis exemption as set out in the Biodiversity Gain Requirements (Exemptions) Regulations 2024, where the development does not impact an onsite priority habitat, and / or less than 25 square metres of onsite habitat / 5 metres of onsite linear habitat would be impacted. The biodiversity gain planning condition would therefore not apply.

Local Finance Considerations

Section 70(2) of the Town & Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. Section 70(4) of the Act defines local finance considerations as a grant or other financial assistance that has been, that will, or that could be provided to a relevant authority by a Minister of the Crown (such as New Homes Bonus Payments), or sums that a relevant authority has received, or will or could receive, in payment of the Community Infrastructure Levy. This development would be CIL-liable.

Human Rights

I have also taken into account the human rights issues relevant to this application. In my view, the Assessment section above and the recommendation represents an appropriate balance between the interests and rights of the applicant (to enjoy his land subject only to reasonable and proportionate controls by a public authority) [and the interests and rights of those potentially affected by the proposal (to respect for private life and the home and peaceful enjoyment of their properties)] and the wider public interest.

Public Sector Equality Duty

In determining this application, regard has been had to the Public Sector Equality Duty (PSED) as set down in section 149 of the Equality Act 2010, in particular with regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. It is considered that the application proposals would not undermine objectives of the Duty.

Duty to Cooperate

In accordance with paragraph 38 of the National Planning Policy Framework 2023 the Council takes a positive and proactive approach to development proposals focused on solutions. We work with applicants/agents in a positive and creative way by offering a pre-application advice service and, where possible, suggesting solutions to secure a successful outcome and as appropriate, updating applicants / agents of any issues that may arise in the processing of their application.

Recommendation

The proposed development would make a modest but positive contribution to local housing supply. Significant weight is given to the reuse of previously developed land and buildings, as supported by the National Planning Policy Framework (NPPF), which promotes the effective use of land to meet housing needs while safeguarding and enhancing the environment.

The site lies within an area undergoing regeneration as part of the 'Brighter Future' initiative. Cheriton Road has been identified in the Place Plan as a key link between Central Station and the town centre, earmarked for public realm improvements. The application site forms a visible part of

this route toward Shellons Street and the town centre, and its redevelopment would support wider regeneration objectives.

The proposed dwelling would meet internal space standards, include provision for bin and cycle storage, and would not result in harm to the amenities of neighbouring occupiers. These are considered neutral factors in the overall planning balance.

While the continued absence of private amenity space is acknowledged, the revised scheme offers a more functional and usable outdoor area for future occupants. Compared to previous submissions, the changes made are sufficient to address earlier concerns and provide an acceptable standard of living.

Although proximity to public open space was previously considered insufficient to offset the lack of private outdoor space, the ongoing development of a new public park at Bouverie Square enhances the local provision. When considered alongside the benefits of brownfield land reuse, the contribution to housing supply, and alignment with regeneration strategies, it is concluded that these factors outweigh the identified harm to residential amenity. On balance, the proposal is recommended for approval.

Recommended Conditions (8)

1

The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2

The development hereby permitted shall not be carried out except in complete accordance with the following approved drawings and documents:

Site & Block Plans 250801.01

Proposed Floor Plans 250801.05

Proposed Elevations 250801.06

Reason: For the avoidance of doubt and in order to ensure the satisfactory implementation of the development in accordance with the aims of Places and Policies Local Plan.

3

No development beyond the construction of foundations shall take place until details to demonstrate that the dwellings hereby permitted shall use no more than 110 litres of water per person per day have been submitted to and approved in writing by the Local Planning Authority. The details shall be implemented as agreed.

Reason: In the interest of sustainable development and minimising water consumption.

4

No further development, whether permitted by Classes A, B, C, D, E, F, G or H of Part 1, or Class A of Part 2, both of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any order revoking and re-enacting that Order) or not, shall be carried out.

Reason: In the interests of the amenities of the area.

5

Before the development hereby permitted is first used, the windows shown on the approved plans in the north western elevation shall be obscure glazed to not less than the equivalent of Pilkington Glass Privacy Level 3, and these windows shall be incapable of being opened except for a high level fanlight opening of at least 1.7m above inside finished floor level and shall subsequently be maintained as such.

Reason: To safeguard the privacy of both neighbouring and future occupiers.

6

Before the development hereby permitted is first used, the window permitted in the north eastern elevation serving the mezzanine floor area shall be obscure glazed to not less than the equivalent of Pilkington Glass Privacy Level 3, to a point no less than 2.0m above the finished floor level of the mezzanine floor, with the windows being incapable of being opened except for a high level fanlight opening of at least 2.0m above inside floor level and shall subsequently be maintained as such.

Reason: To prevent overlooking of adjoining properties and to safeguard the privacy

of neighbouring occupiers.

7

Prior to first use of the premises for the use hereby permitted, the bin and cycle store shown on the approved plans shall be made available in full, and shall thereafter be retained in association with the premises at all times.

Reason: In the interests of visual and residential amenity.

8

The materials to be used in the construction of the external surfaces of the development, including the new gates and pillars, hereby permitted shall match those on the existing building in terms of type, colour and texture.

Reason: In the interests of visual amenity.